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Timberland  
Management

• Natural  
Resources

• Real  
Estate

• Land  
Conservation

July 27, 2010

**Comments of Sarah la Cour, Director of Conservation and Planning**

**In response to the Massachusetts Department of Energy Resources (DOER) request for comments regarding proposed changes to biomass-related Renewal Portfolio Standards (RPS) as a result of recent Manomet Study results.**

Private forest landowners like W. D. Cowls account for nearly 80% of forested lands in the Commonwealth. In order to assure conservation of private forestland the Commonwealth must encourage forest products markets, reduce regulatory burdens, and incentivize stewardship.

Enacting scientifically unjustified and reactionary restrictions on the sale of and markets for low grade wood on private forested land, will make private forests unaffordable and more importantly, ecologically unhealthy. In setting forest policy, the Patrick Administration should be consulting its expert forest biologists and private forest stewards. We know that biomass energy markets can help our forests' health and improve our rural economies, while producing low-carbon renewable energy.

Cowls is an example of long-term private, forest land stewardship. As the state's largest private landowner, Cowls has been sustainably managing its Tree Farms since 1741. We, like most family forest owners, make harvesting decisions based on long term forest health and optimal production of wood. We believe that biomass will help, not harm Massachusetts private forest resources.

One of the biggest challenges facing landowners is how to incentivize hired loggers to cut and utilize the low grade wood to ensure forest health and future growth. Since there are currently few economically viable markets for low grade wood, trees marked for necessary harvest often remain standing in the forests. Biomass markets need to be encouraged in order to continue to make private forests viable for the long term.

The idea that landowners like Cowls would suddenly clearcut or in any way over-cut their forests to produce biomass fuel defies logic and basic economics. Good forest management includes cutting for a variety of purposes such as merchantable timber, wildlife habitat, water quality, pests, disease and invasive species. Forests produce a wide range of products, from high-value veneer logs to saw logs to pulp for paper and cord wood for heat. Biomass grade wood is typically a by-product of forest management for these above mentioned goals. Its significant removal is in fact an integral component of long-term forest sustainability and health. Material headed for a biomass facility would otherwise decompose in the forest, releasing CO<sub>2</sub> without producing any energy, and in fact prevent optimal forest growth.

Cowls and other forest landowners are troubled by the recent events and emotional reactivity surrounding biomass energy. We fear that in response to vocal environmental activists, the Patrick Administration is about to make policy that discriminates against locally grown, sustainably produced sources of renewable energy that can help reduce Massachusetts' dependence upon non-renewable fossil fuels. With over 63% of the State in forestland, wood is one of the few renewable fuel resources that is available, abundant, and underutilized in Massachusetts.

Local biomass energy plants would not only help provide the renewable energy that our state's economy needs, but, as documented in the recently-released Manomet Study, would over time reduce our fossil fuel-caused greenhouse gas emissions. By using locally-grown biomass, the biomass energy plants will also help improve management of our woodlands, public and private, and increase local jobs in harvesting, trucking, milling, and possibly processing the biomass materials.

Energy plants are not the only potential new markets for woody biomass. As documented in the Manomet Study, schools, colleges, hospitals and other institutions can also realize cost savings and carbon emission reductions by converting to some form of biomass, either to generate heat, on-site electricity, or cogeneration. Whether they burn wood chips, wood pellets or other materials, they will reduce fossil fuel consumption and emissions, utilize locally grown and harvested materials, save money, and reduce greenhouse gas emissions over the long term.

We urge the Administration to base private forest land policymaking not on personal and partisan philosophies against "commercialism," but instead on the best scientifically defensible data and advice of forest biologists. By increasing regulatory burdens and setting arbitrary standards that make no scientific sense on the ground you will take away valuable forest products markets and jobs. This in turn will diminish the economic viability of private forestry efforts and jeopardize our ability to retain land in forestry and not sell it off for development.

We watch in disbelief as the Administration is virtually eliminating management on state forest land. We will not stand by and watch unwarranted and unscientific regulatory intrusions threaten our rights to make key decisions about the sustainable management and future potential of private woodlands.

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*Since 1741 Cowls has been acquiring timberland and managing it for natural resource production. Today Cowls owns and sustainably manages Tree Farm-certified timberland in 28 towns in Hampshire and Franklin Counties in Massachusetts. All Cowls timberland is conserved under Massachusetts Chapter 61. Cowls has won numerous national land conservation awards including: "Outstanding Achievements in Sustainable Forestry" from the American Tree Farm System/American Forest Foundation; "Private Lands Stewardship Award" from the Association of Fish and Wildlife Agencies; "Forest Stewardship Award" from the National Hardwood Lumber Association; the "Cooperative Conservation Award" from the US Department of the Interior; and the Northeastern Loggers' Association's (NELA) 2008 Outstanding Management of Resources Award.. For more information about Cowls, go to [www.cowls.com](http://www.cowls.com).*

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